## **REMARKS/ARGUMENTS**

Following amendment, twenty (20) total claims and four (4) independent claims (claims 1,7, 13 and 20) remain in this application. Applicants seek to amend the existing claims and to add additional claims to clarify the subject matter of the present invention and to place the present application in better condition for examination. Applicants believe that the present Amendment adds no new subject matter and respectfully request the entering of this Amendment.

## Claim Rejections under 35 USC §103(A)

In sections 2-11, the Office Action rejected claims 1- 20 as being obvious in view of U.S. Patent No. 5,905,715 (the "Azarmi" reference) in combination with either U.S. Patent No. 6,236,857 (the "Calabrese" reference) and/or U.S. Patent No. 6,477,370 (the "Sigler" reference). Applicants have carefully reviewed Azarmi and believe that this reference does not teach or suggest each and every element of the present invention as contained in the amended claims and that the Calabrese and Sigler references do not make up for the deficiencies in the Azarmi.

In particular, the present invention is directed toward a method and related system for processing orders between different related communication systems (e.g., local and national telephone services, telephone and Internet services, etc.). Prior to the development of the present invention, a communications service request (e.g., requesting a new service or a change in existing service) was relatively time consuming and expensive to implement because the various different services operated on different networks with different protocols. Generally, the service requests were received, interpreted, and carried out manually. For instance, if a consumer submitted a request to a long distance telephone services to change long distance service options, that request would be received by the long distance provider, checked manually for authenticity and correctness (since it would be undesirable to wrongly alter services without proper authorization), and forwarded to a local telephone service (who actually administer the customer's telephone service). To reduce associated costs, both the local and long distance providers have automated the handling of their respective services requests. For instance, a particular provider could easily change services options to its existing customers, and thus, a customer could connect on-line to a service provider and request changes in billing options services associated with that particular provider. The

customer could not easily request service changes associated with one particular provider by contacting a second provider. For example, difficulties arise where long distance providers would need to coordinate with local service providers for new customers or customers switching service providers. Moreover, different communication networks use different computer languages and protocols, making it difficult to automatically transfer request between different communication networks. Similar problems may arise with providing Internet and networking access to consumers since this network access generally requires coordination between services (e.g., large networks and the local Internet Service Providers (ISPs) the supervise and administer access to these networks or ISPs that coordinate with telephone service companies to provide Internet access over telephone lines). The difficulties arise between the different layers of communication service providers because they are separately owned and administered, typically employing different service protocols. Thus, a service request received at one layer cannot be merely forwarded to a different layer without some type of manipulation and processing. The communications industry increasingly allows consumers to mix and match services and to changes service providers as desired. Moreover, the communications industry operates at very small margins. Thus, even small transactional costs related to services changes are substantial. Accordingly, the present invention seeks to address this situation by operating as an intermediary between different service layers to receive and translate services requests between the different communication service layers.

In contrast, Applicants believe that Azarmi does not address needs associated with communications service request and specifically does not provide the functions and elements of the present invention. Azarmi merely provides a system and method for overseeing and managing a particular network. In the context of the present invention, the technology of Azarmi could be used to oversee a local or long distance telephone network. Azarmi could be used, for instance, to monitor the performance of the network and to carry out service change request over that network. As suggested above, the automatic execution of service request over a particular network (e.g., local or long distance service changes or activations) are well known. However, there is no teaching or suggestion in Azarmi or other cited references to enable the execution of service requests where the requests are received and implemented over disparate communication networks. There is simply no suggestion in Azarmi that the different requests come in different formats or protocols, and that the requests are translated to a separate protocol as needed to fulfill to purchase order. While Azarmi contains

embodiments that employ different communication formats, Azarmi merely indicates that the system may be deployed using one of the enumerated communication means. There is simply no teaching that several of the communication means may be employed *simultaneously*, let alone that any *translation* from one communication means to another communication means is ever performed.

Applicants believe that the combination of Azarmi with Calabrese and/or Sigler does not teach or suggest the present invention, as provided above. Calabrese provides a system and method for coordinating and integrating services between wireless and traditional phone networks. There is no suggestion in Calabrese related to the initiation of a local service by a core provider network through a local provider network and the translation of service requests as needed to enable this multiple communication network service handling. While Calabrese addresses different services over different communication mediums, Calabrese deals with different mediums implemented by a shared communication network. Specifically, Calabrese does not suggest the translation of service request between different networks. For example, the technology of Calabrese could not be used to allow a user to contact a cellular phone network to implement wired telephone service.

Likewise, Sigler provides a system and method for coordinating and integrating services between satellite communication networks. There is no suggestion in Sigler related to the initiation of a local service by a core provider network through a local provider network and the translation of service requests as needed to enable this multiple communication network service handling. While Sigler addresses different services over different satellites, Sigler deals with different satellites implemented by a shared communication network. Specifically, Sigler does not suggest the translation of service request between the different networks. For example, the technology of Sigler could not be used to allow a user of one satellite network to initiate or otherwise modify services on a different, competing satellite network.

The claims have been amended to clarify these differences. Accordingly, it is believed that the rejection of claims 1-20. Applicants suggest allowance of these claims in view of the present amendments and remarks.

## Conclusion

In view of the foregoing, the Applicants respectfully request that the Examiner considers the above-noted amendments and remarks and that the Examiner issues a timely allowance of the pending claims. The Examiner is invited to contact Applicants' undersigned representatives to expedite prosecution.

If there are any fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-1349.

Respectfully submitted,

Dated: June 7, 2004

**HOGAN & HARTSON LLP** 

555 13<sup>th</sup> Street, N.W. Washington, D.C. 20004 Telephone: 202-637-5600 Facsimile: 202-637-5910

Customer No. 30398

Celine Jimenez Crowson

Registration No. 40,357

David D. Nelson

Registration No. 47,818